

REMARKS

Claims 1-3, 5-12, 31, and 35-79 are pending and stand rejected. In view of the Remarks that follow, Applicants respectfully request that Examiner reconsider all outstanding rejections and withdraw them.

Interview Summary

Applicants thank the Examiner for her time in conducting a telephone interview on March 25, 2009 with Applicants' representative Robert R. Sachs and Matthew Harvey. During the telephone interview, Applicants' representative and the Examiner discussed Owens (U.S. Patent Application Publication 2004/0022155) and the claim language of independent claims 1, 42, and 61. The Examiner agreed to reconsider the outstanding rejections in view of the arguments included herein.

Response to Rejections Under 35 USC 102(e) and 35 USC 103(a)

Claims 1-3, 10, 12, 35-36, 40-46, 49-50, 52, 53, 61-65, 68-69, 71, and 72 stand rejected under 35 U.S.C. §102(e) as being anticipated by Owens, U.S. Patent Application Publication 2007/0022155. Claims 5-9, 11, 31, 38-39, 47-48, 54-60, 66-67, and 73-79 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Owens in view of Belfiore, U.S. Patent Application Publication 2002/0059425. Claims 37, 51, and 70 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Owens in view of Bates, U.S. Patent 6,873,982. These rejections are traversed and discussed together for purposes of clarity.

Independent claim 1 recites a method for capturing event data associated with a plurality

of different types of articles generated by a plurality of different client applications:

storing a plurality of different event schemas, each event schema associated with at least one of the types of articles **and defining a format for storing event data;**

detecting an event, the event including a user interaction with an article;

responsive to the event, determining an event schema associated with the type of the article; and

storing, in a data store, event data identifying the event and the article using the format defined by the event schema associated with the type of the article.

Owens does not disclose or suggest at least the claimed feature of, “storing a plurality of different event schemas, each event schema … defining a format for storing event data.” Fundamentally, Owens is not directed towards the storage of event data associated with different types of articles. Instead, Owens discloses a method for managing behaviors of client-executed desktop applications (e.g., Excel™, Word™, etc.) to support integration of the desktop applications with server-executed enterprise applications. *See* Owens FIG. 1 and Abstract. In Owens, when a user interacts with a desktop application such as a spreadsheet or document, the operating system invokes an action handler that implements one or more server-defined behaviors at the desktop application. *See* Owens [0003], [0011], [0013]. The action handler can implement the behaviors by presenting a web form to the user via a web browser. *See* Owens [0030]. The user then interacts with the desktop application through the web form, with the web form restricting user interaction with the desktop application to those server-defined behaviors implemented by the action handler. *See* Owens [0031]. Thus, the web form guides user interaction with the desktop application to ensure compliance with the server-defined behaviors implemented by the action handler. *See* Owens [0011], [0031], [0048], [0059].

The Examiner has alleged that the “web forms” described by Owens disclose event schemas that define a format for storing event data. *See* Office Action dated January 28, 2009, page 2. Applicants respectfully disagree. As stated by Owens, “action handlers provide a mechanism for instituting the server-defined behaviors at the desktop” and “locally cached web forms...provide a user with options for interacting with the desktop objects according to those behaviors.” *See* Owens Abstract. Hence, as described above, the enterprise application defines a behavior of the desktop application via an action handler, and the action handler can enforce the policy via a web form. The web form is merely a way for the user to input data into the desktop application in a manner specified by the enterprise application. Nowhere does Owens describe a web form as storing event data or defining a format for storing event data.

During the Interview, the Examiner stated that she interpreted Owen’s disclosure of “web forms” as corresponding to the claimed “a format for storing event data.” Further, the Examiner stated that she interpreted the disclosure in Owens of the web forms being “locally cached” as corresponding to the claimed “storing.” After further discussion, the Examiner then expressly agreed that Owen’s web forms do not define the format for storing data, in the manner claimed. Hence, Owens’ web forms cannot reasonably be interpreted as comprising event schemas that define a format for storing event data.

Applicants respectfully submit that, whether in discussing web forms or otherwise, Owens does not disclose or suggest at least the claimed feature of, “storing a plurality of different event schemas, each event schema ... defining a format for storing event data.”

Given that Owens does not contemplate the storage of event data or event schemas that define a format for storing event data, it logically follows that Owens also does not disclose or suggest at least the claimed feature of, “storing, in a data store, event data identifying the event

and the article using the format defined by the event schema associated with the type of the article.”

Belfiore does not remedy the above-described deficiencies of Owens. Rather, Belfiore describes a platform for improving interactions within a distributed computing network. *See Belfiore [0015]*. Belfiore mentions events, but in the context of driving communications and other activities within the network. *See Belfiore [0020], [0119]*. Hence, although Belfiore describes a variety of schemas, they are for data communication – not storage of event data. *See Belfiore [0018]*. Accordingly, Belfiore does not describe schemas that define a format for storing event data. Indeed, the word “event” does not appear in the section of Belfiore regarding schemas. *See Belfiore [0067]-[0089]*. Thus, Belfiore does not disclose or suggest at least the claimed features of “storing a plurality of different event schemas, each event schema ... defining a format for storing event data” or “storing, in a data store, event data identifying the event and the article using the format defined by the event schema associated with the type of the article,” which were shown above to be absent from Owens. Accordingly, Owens and Belfiore do not disclose or suggest the claimed invention.

Bates also does not remedy the above-described deficiencies of Owens and Belfiore, nor does the Examiner assert that it does. Rather, Bates is cited merely to show the indexing of search results in a database. Bates does not disclose or suggest at least the claimed features of “storing a plurality of different event schemas, each event schema ... defining a format for storing event data” or “storing, in a data store, event data identifying the event and the article using the format defined by the event schema associated with the type of the article,” which were shown above to be absent from Owens and Belfiore.

Independent claims 42 and 61 recite similar features as those recited in claim 1. Hence, based on the arguments advanced above, Applicants respectfully submit that independent claims 1, 42, and 61 are patentably distinguishable over Owens, Belfiore, and Bates, alone or in combination, and request their allowance. The dependent claims incorporate the limitations of their respective base claims and are allowable for at least the same reasons.

The Examiner is encouraged to contact the undersigned attorney if it would be beneficial to further advance the prosecution of the application.

Respectfully submitted,
MIHAI FLORIN IONESCU ET AL.

Dated: 3/30/2009 By: /Robert R. Sachs/

Robert R. Sachs, Reg. No. 42,120
Attorney for Applicants
Fenwick & West LLP
Silicon Valley Center
801 California Street
Mountain View, CA 94041
Tel.: (415) 875-2410
Fax: (415) 281-1350
Email: rsachs@fenwick.com